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March 17, 2020

VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

With the consent of the Government (AUSA Tanya Hajjar), we move the Court to adjourn the schedule for the sentencing memoranda, Fatico hearing and sentencing date for Keith Raniere. Currently, the defendant's sentencing memorandum is due on March 23, 2010, the Government's sentencing memorandum is due on March 30, 2020, a Fatico hearing is scheduled for April 13, 2020 and the defendant's sentencing hearing is scheduled for April 16, 2010.

Counsel for the defendant has been advised by the MDC Brooklyn that counsel visits with MDC inmates will not be permitted for a period of 30 days commencing on Friday, March 13, 2020. Counsel requested an in-person legal visit with Raniere, which has been denied. Accordingly, it is not possible to properly prepare a sentencing memorandum, with the defendant's full participation, in a case of this magnitude and complexity, given the understandable restrictions on counsel visitation during this unprecedented health crisis.

We therefore request that the Court adopt the following schedule, consistent with any other Court obligations: defendant's sentencing memorandum shall be due on April 27, 2020; Government's sentencing memorandum shall be due on May 4, 2020; a Fatico hearing on May 18, 2020 and the defendant's sentencing hearing on May 21, 2020.

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Thank you for your consideration of this matter.

Respectfully submitted,

/s/

Marc A. Agnifilo, Esq., *Of Counsel*
Teny R. Geragos, Esq.

cc: Counsel for the government (via ECF)